

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**IN RE:** ) **CHAPTER 13**  
 )  
**VERNE EDWIN FOWLER,** ) **CASE NO. 09-71321-WLH**  
 )  
**Debtor.** )

**NOTICE OF ASSIGNMENT OF HEARING**

**PLEASE TAKE NOTICE** that **VERNE EDWIN FOWLER**, has filed an  
*APPLICATION FOR ORDER APPROVING EMPLOYMENT OF UNCLAIMED FUNDS*  
*COLLECTION AGENT* and related papers with the Court January 18, 2013 (Docket Entry 64).

**PLEASE TAKE FURTHER NOTICE** that the Court will hold a hearing on the  
application in **Courtroom 1403**, United States Courthouse, 75 Spring Street, S.W., Atlanta,  
Georgia on **February 13, 2013 at 9:30 AM**.

This 18<sup>th</sup> day of January, 2013.

Valldejuli & Associates, LLC  
2199 Lenox Road, Suite A  
Atlanta, Georgia 30324  
(404) 636-995

\_\_\_\_\_/S/\_\_\_\_\_  
Richard K. Valldejuli, Jr.  
GA State Bar # 723225  
Attorney for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
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<b>IN RE:</b>	)	<b>CHAPTER 13</b>
	)	
<b>VERNE EDWIN FOWLER,</b>	)	<b>CASE NO. 09-71321-WLH</b>
	)	
<b>Debtor.</b>	)	

**APPLICATION FOR ORDER APPROVING  
EMPLOYMENT OF UNCLAIMED FUNDS COLLECTION AGENT**

**COMES NOW**, Verne Edwin Fowler, and by and through his attorney of record, files this *Application to Employ* William D. Deutchman in connection with the following activities:

1.

To assist the Debtor in the recovery of a non-exempt asset of this Estate not previously listed by the Debtor herein in his Schedules and consisting of a claim to unclaimed funds to which this Estate appears to be entitled.

2.

William D. Deutchman is particularly well suited to serve as Debtor's agent for this limited purpose for the reason that he is familiar with the research processes and strategies regarding unclaimed funds that may have been deposited with states, Bankruptcy Courts and elsewhere.

3.

Specifically, Mr. Deutchman has advised Debtor's undersigned counsel that through his research, he has uncovered funds totaling nearly \$14,000.00 of which the Debtor herein was apparently unaware at the time of filing of this Chapter 13 Proceeding.

4.

Upon this Court's approval of employment, Mr. Deutchman proposes to disclose all relevant details in return for a fee for his services equal to thirty percent (30%) of the gross recovery actually received by this Trustee. In the event of such a significant recovery, this Estate will be measurably benefited.

5.

Mr. Deutchman represents no interest adverse to that of the within Estate, that he is a “disinterested person” within the definition of § 101(13) of the Bankruptcy Code, and is qualified to act as Debtor’s agent herein, and that pursuant to §327(d) of the Bankruptcy Code, it would be in the best interest of the within Estate to authorize Mr. Deutchman to serve as agent herein for this limited purpose on a contingency fee basis of thirty percent (30%) of any ultimate gross recovery, plus reimbursement of out-of-pocket expenses incurred.

6.

There shall be no fees or expenses payable to Mr. Deutchman except out of funds that he may generate for, and that are actually received, by the Estate. Consequently, his employment can only be a benefit to this Estate and not diminish this Estate.

7.

Attached hereto as Exhibit A” is an Affidavit of William D. Deutchman accepting the proposed employment and certifying that he has no interest adverse to this Estate, except as outlined above, and that he understands and acknowledges that his fees shall be payable only in the event of successful collection by this Estate of these unclaimed funds as an asset of this Estate and upon filing of an appropriate fee application.

8.

Based on the foregoing, this Estate can only benefit from Mr. Deutchman's retention and cannot be diminished or adversely impacted in any way.

**WHEREFORE**, Debtor requests that this Court approve the employment of William D. Deutchman as Unclaimed Funds Collection Agent to assist the Debtor by disclosing any and all relevant information and documentation he has in regards to unclaimed funds to which this Estate may be entitled and to assist in the recover thereto.

This 18<sup>th</sup> day of January, 2013.

Valldejuli & Associates, LLC  
2199 Lenox Road, NE, Suite A  
Atlanta, Georgia 30324  
(404) 636-9957

/S/  
Richard K. Valldejuli  
GA State Bar # 723225  
Attorney for Debtor

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served all parties in the foregoing matter with a copy of this foregoing ***APPLICATION FOR ORDER APPROVING EMPLOYMENT OF UNCLAIMED FUNDS COLLECTION AGENT*** and **NOTICE OF ASSIGNMENT OF HEARING** by ECF Transmission and/or by depositing in the United States Mail, a copy of same in a properly addressed envelope with adequate postage thereon to:

Office of the United States Trustee  
362 Richard B. Russell Federal Building  
75 Spring Street  
Atlanta, Georgia 3030

Nancy J. Whaley  
Nancy J. Whaley, 13 Trustee  
Suite 120  
303 Peachtree Center Avenue  
Atlanta, GA 30303

This 18<sup>th</sup> day of January, 2013.

\_\_\_\_/S/\_\_\_\_\_  
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GA State Bar # 723225  
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